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November 4, 2021

VIA ECF

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: *Black v. Ganieva, et al.*, No. 1:21-cv-08824 (PAE)

Dear Judge Engelmayer:

Please find attached a letter from co-counsel, Susan Estrich from Estrich Goldin LLP. Ms. Estrich is in the process of submitting her *pro hac vice* application for this matter.

Respectfully,

/s/ Ryan Rakower

Ryan Rakower

quinn emanuel urquhart & sullivan, llp

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40 Foley Square, Room 2201
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Re: *Black v. Ganieva, et al.*, No. 1:21-cv-08824 (PAE)

Dear Judge Engelmayer:

I write on behalf of Plaintiff Leon Black in response to the Letter (ECF No. 12) dated November 3, 2021 by Defendant Wigdor LLP.

First, I want to apologize for troubling you with a matter of timing that the parties should be able to work out themselves, and we promise to do everything we can to assure that we do so in the future.

Second, we want to clear up some confusion on the service issue. We understood Wigdor's offer to accept service to be conditioned on agreeing to extend their deadline to respond to the complaint until February 4, 2022 – more than two months, as opposed to 21 days. Our concern, then and now, was that the extension would result in a lengthy adjournment of the Initial Case Management conference in this case and a delay in the commencement of discovery under Rule 2(B) of this Court's Individual Rules and Practices. In order to avoid delay while we tried to work out our differences, we served the parties, including Ms. Ganieva's concierge, who she authorized to accept service on her behalf. (ECF Nos. 14, 15.)

Third, as to the matter at hand. Of course we are willing to give Defendants the time they need to retain counsel for this matter. We did offer to agree to the lengthy extension they requested if they would agree to join us in asking that the initial conference occur on or before December 10, 2021, with discovery to begin after that conference. They rejected our offer, which is why I am writing to you. We are trying to be reasonable. But the conduct we complained of in the complaint is ongoing, and we do not want to lose critical time.

In sum, we respectfully request that whatever extension of time the Court chooses to grant, it also schedule an initial conference at the Court's earliest convenience with discovery to begin thereafter.

Thank you for your attention to this matter; we regret that we could not or did not resolve it ourselves.

Respectfully,

/s/ Susan Estrich

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Counsel for Plaintiff
(Motion for *pro hac vice* pending)

Cc: All Counsel of Record (by ECF)